

From: [Michael Karnosh](#)
To: [Eric Blischke/R10/USEPA/US@EPA](#)
Cc: [audiehuber@ctuir.com](#); [cunninghame@gorge.net](#); [erin.madden@gmail.com](#); [jpeers@stratusconsulting.com](#); [Lisa Bluelake](#); [tomd@ctsi.nsn.us](#); (b) (6); [wbarquin@hk-law.com](#)
Subject: Re: Round 3B Status Letter
Date: 03/31/2008 01:37 PM

Thanks Eric. Your email answered my questions.

Mike

-----Original Message-----

From: Blischke.Eric@epamail.epa.gov <Blischke.Eric@epamail.epa.gov>
To: Michael Karnosh
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Sent: Thu Mar 27 09:11:13 2008
Subject: Re: Round 3B Status Letter

Michael, here is a quick status summary of the lamprey ammocoete tissue analysis issue.

Last fall, we could not reach agreement with the LWG on whether to perform this analysis. In order to have the testing move forward, we deferred the issue. Once the testing was completed, we revisited the issue and discussed it the February 27, 2008 TCT meeting. Following our discussion, I sent the following email to Helle Anderson on March 10, 2008 outlining our rationale for performing this analysis.

Helle, sorry to have taken so long to get back to you.

We discussed this at last Wednesday's TCT meeting. As you are aware, the purpose of the water toxicity testing was to determine the relative sensitivity of the lamprey ammocoetes to a range of contaminants based on mode of toxic action. The testing that was performed was generally successful in developing LC50s which may be used to evaluate the range of sensitivity of lamprey ammocoetes based on exposure to water column contaminants. However, this information will not provide us with an estimate of the relative sensitivity as measured through body burden. Currently, we have lamprey ammocoete tissue data collected from the Portland Harbor site. Although the number of lamprey ammocoete tissue samples collected was limited, a comparison of lamprey tissue body burdens to tissue-residue toxicity reference values (TRVs) may be used to evaluate risks to lamprey ammocoetes. Measuring tissue body burdens from the water toxicity testing will provide us with an estimate of the relative sensitivity of the lamprey ammocoetes based on another line of evidence - tissue-residue TRVs. Generally, there is good TRV information for most of the chemicals tested (i.e., lindane, copper, pentachlorophenol and diazinon). Secondarily, analysis of tissues from the toxicity tests will document contaminant exposure of the ammocoetes during the tests, a concern that has been raised by some on the government team.

Because the relative sensitivity of organisms exposed to chemicals as measured based on water exposures vs. body burden can vary, EPA is

requesting chemical analysis of the lamprey ammocoetes for the water toxicity test chemicals. Organisms exposed to lindane should be analyzed to lindane; organisms exposed to copper should be analyzed for copper; etc. If sufficient numbers of ammocoetes are available, EPA requests separate analysis of the dead ammocoetes during each 24 hour observation period, as well as analysis of the remaining live ammocoetes at the end of the 96-hour exposure period. Ammocoetes from multiple replicates within a toxicity test may be pooled if needed to obtain sufficient tissue mass for analysis. This request assumes that the ammocoetes were stored in such a manner that permits this type of tissue analysis. EPA believes that this information will allow us to better evaluate the risks to lamprey ammocoetes as measured by whole body lamprey ammocoete tissue analysis collected from the Portland Harbor site.

Please let me know if you have any questions.

We have yet to receive a response from the LWG to this email. This is why I stated in my letter (for completeness really) that this topic is still under discussion.

Regarding the timing of the study, you are correct that it is unlikely that we will have these results prior to the June 1, 2008 data lock down date. However, we do believe that we will be able to use this information in the development of PRGs and in the final RI and baseline risk assessment report.

I hope you find this summary useful. Let me know if you have any questions.

Thanks, Eric

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Subject
Re: Round 3B Status Letter

Eric,

Thanks for forwarding the R3B status letter. I have a question about the status of the tissue analysis on the ammocoetes from the water tox test. I have been assuming that the tissue analysis would happen and that there was no issue to be resolved in that regard. However, the letter says that there are issues and that discussions are ongoing.

Is the issue mainly one of timing? Jennifer from Stratus suspects it could be that the tissue analysis might come back after the data lockdown date (June 1 if I'm not mistaken). If this is the issue, please confirm. If not, please elaborate as this is of some concern to the five tribes.

Thanks,
Mike Karnosh
Confederated Tribes of Grand Ronde

-----Original Message-----

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Sent: Mon Mar 24 17:13:17 2008
Subject: Fw: Round 3B Status Letter

FYI

----- Forwarded by Eric Blischke/R10/USEPA/US on 03/24/2008 05:12 PM

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Blischke/R10/USE
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03/24/2008 05:07 PM
To
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Subject
Round 3B Status Letter

Attached is the letter summarizing the status of Round 3B sampling activities. A table is attached summarizing the status of all EPA identified data needs relative to Round 3.

If you have questions, please let me know.

Thanks, Eric

(See attached file: Round3BStatusltr032408.pdf)(See attached file: Round3DataGapSummary032408.pdf)